

**LOCAL BANKRUPTCY FORM 9019-1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

MICHELE RAE ROUSE  
aka QUALITY SAFETY SERVICES  
fka Michele Lofgreen

**Debtor(s)**

FORS MOTOR CREDIT COMPANY LLC

**Plaintiff(s)/Movant(s)**

vs.

MICHELE RAE ROUSE,  
JACK A. ZAHAROPOULOS, Trustee

**Defendant(s)/Respondent(s)**

CHAPTER 13

CASE NO. 1 - 20 -bk- 03497 HWV

ADVERSARY NO.     -     -ap-      
(if applicable)

Nature of Proceeding: STAY LIFT

Pleading: Motion for Relief

Document #: 25

**REQUEST TO REMOVE FROM THE HEARING/TRIAL LIST\***

CHECK ONE:

☐ The undersigned hereby withdraws the above identified pleading with the consent of the opposition, if any.

☒ The undersigned counsel certifies as follows:

(1) A settlement has been reached which will be reduced to writing, executed and filed within (please check only one).

- ☐ Thirty (30) days.  
☒ Forty-five (45) days.  
☐ Sixty (60) days.

(2) If a stipulation is not filed or a hearing requested within the above-stated time frame, the Court may dismiss the matter without further notice.

(3) Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: July 16, 2021

Howard Gershanman, Esquire

Attorney for Ford Motor Credit Company LLC

\*No alterations or interlineations of this document are permitted. This request must be filed twenty-four (24) hours prior to the hearing.